

EPA-2299

Reid Rosnick/DC/USEPA/US

08/19/2011 07:49 AM

To Tom Peake, Daniel Schultheisz, Andrea Cherepy

cc

bcc

Subject Fw: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA)
combined report

FYI

Reid J. Rosnick
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----- Forwarded by Reid Rosnick/DC/USEPA/US on 08/19/2011 07:48 AM -----

From: Val Tabi <vta.economist@yahoo.com>
To: Reid Rosnick/DC/USEPA/US@EPA, "vta.economist@yahoo.com" <vta.economist@yahoo.com>
Date: 08/18/2011 08:52 PM
Subject: Fw: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

Reid,

I am attaching a file with comments that I sent to SC&A. I am also providing some economic considerations in the previous attachment to you explaining my explanations for providing the comments. Please let me know if you have any questions.

Val Anoma, Economist

ORIA

----- Forwarded Message -----

From: Val Tabi <vta.economist@yahoo.com>
To: "azeitoun@scainc.com" <azeitoun@scainc.com>
Sent: Friday, August 12, 2011 7:40 AM
Subject: Re: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

Yes I am working late. What are you doing up at this time?.

From: azeitoun <azeitoun@scainc.com>
To: 'Val Tabi' <vta.economist@yahoo.com>
Sent: Friday, August 12, 2011 7:18 AM
Subject: RE: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

You are working so late.....Thanks

Abe Zeitoun

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From: Val Tabi [mailto:vta.economist@yahoo.com]
Sent: Friday, August 12, 2011 1:15 AM
To: Valentine Anoma; abez2n@verizon.net; azeitoun@scainc.com; pettingillh@verizon.net
Subject: Re: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

Abe & Harry,

In addition to my last comments on August 2, 2011 and attached below, I am attaching a document which summarizes some of my concerns. Please review it for our meeting on Monday August 15, 2011.

Val Anoma, WAM 2-04

From: Valentine Anoma <Anoma.Valentine@epamail.epa.gov>
To: abez2n@verizon.net; azeitoun@scainc.com
Cc: Valentine Anoma <Anoma.Valentine@epamail.epa.gov>; Reid Rosnick <Rosnick.Reid@epamail.epa.gov>; azeitoun@scainc.com; pettingillh@verizon.net
Sent: Tuesday, August 2, 2011 7:52 PM
Subject: Re: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

Abe,

I have spent the last couple of days reviewing and providing comments on Work Assignment 2-04 (Support to develop an Economic Impact Analysis (EIA) for Subpart W (40 CFR 61.250). In Section 1.5 of the report, you specifically stated what the deliverables would be; namely, 1. Document the initial assessment as presented in the original BID; 2. Address the costs to revisit old impoundments not perviously reviewed under the standard; 3. Assess the incremental costs to fully implement the design requirements for all impoundments constructed after 1989.

The draft report (2-04) in its current form has a lot of regulatory and industry history but does not contain any of this information except Section 6.0 that contains 5 1/2 paragraphs of summary information. Is there another report that contains the deliverables that you mentioned or is this information contained in any part of the current report (that I may have overlooked) considering we have 6 pages of 63 references?

*Val Anoma, Economist
WAM: 2-04*

From: "Harry Pettingill" <pettingillh@verizon.net>
To: Valentine Anoma\DO\N\SEPA\MS@EPA, Reid Rosnick\DO\N\SEPA\MS@EPA
Cc: <azeitoun@scainc.com>, "Harry Pettingill" <pettingillh@verizon.net>, "Les Skoski" <lskoski@aol.com>, "Gary at Quality Label Pins" <gary@qualitylabelpins.com>, "Steve Marschke" <smarschke@scainc.com>, <djohnsgoldin@comcast.net>
Date: 08/02/2011 10:02 AM
Subject: FW: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

Val and Reid,

I am forwarding a copy of the draft final BID/EIA report on subpart W NESHAAP we sent to you for comment on July 21st. I know you both may have been away but if you could provide your comment or acceptance on this as soon as possible I will be able to issue a final within seven days of receipt. I have reviewed the draft rule package you shared and it seems to me the BID/EIA does support your intended action.

Val,

After the last conference call with EPA regarding efforts on Task 2B of Work Assignment 2-04 (EIA for 40 CFR 192) I can report the following. We have held a large conference within SC&A to discuss our collective efforts on both the risk analysis and economic impact issues as suggested by Tom Peake. Everyone understands that EPA is interested in a forward review and not revisitation of past closed sites and operations. Second we understand that at this juncture EPA is not interested in

(b)(5) - Deliberative Process Privilege

Rather the focus is on two aspects, 1) (b)(5) - Deliberative Process Privilege

Depending on your responses and our effort I'd expect to have an annotated outline of the 40 CFR 192 done for your review by September 15th if that's acceptable.

Harry

From: Nancy S. Johnson [<mailto:nsjadmin@ktd.net>]

Sent: Thursday, July 21, 2011 12:17 PM

To: 'Reid Rosnick'; 'Val Anoma'

Cc: 'Abe Zeitoun'; 'Harry Pettengill'

Subject: Transmittal - Revised WA 2-03 (BID) and WA 2-04 (EIA) combined report

The attached draft, *Technical and Regulatory Support to Develop a Rulemaking to Potentially Modify the NESHAAP Subpart W Standard for Radon Emissions from Operating Uranium Mills (40 CFR 61.250)*, is being sent to you in accordance with Contract Number EP-D-10-042 for review and comment. This document represents a rewrite and response to comments on the initial BID/EIA document sent to EPA on March 25, 2011. Per our discussion (EPA and SC&A), we are requesting that the EPA WAMs review is updated report and provide any final comments back to SC&A within 7 days of receipt. Upon receipt of any additional comments from EPA, SC&A will complete and issue the final report to EPA within 7 days, in accordance with Work Assignment 2-03 and Task 2A of Work Assignment 2-04.

Please provide any comments or questions on the content of this report to Harry Pettengill. If you have any problems with the attached MS Word documents, please contact me.

Sincerely,

Nancy

Nancy S. Johnson
SC&A Production Coordinator
570-857-0111
njohnson@scainc.com



Comment_Draft-EIA-BID-08-11-2011-.doc